

## **REMARKS**

### **I. Introduction**

This paper is filed in response to the Office action of October 2, 2008, which has been carefully considered.

Claims 13 and 22 are rejected under 35 U.S.C. 103(a) over the U.S. Patent No. 6,601,679 to Crenella, et al. in view of U.S. Patent Publication No. 2003/0191730 to Adkins and in further view of U.S. Patent Publication No. 2002/0167393 to Mabuchi. Claims 14-21, 23-27 and 31 are rejected under 35 U.S.C. 103(a) over Crenella in view of Adkins, Mabuchi, U.S. Patent Publication 2004/0174073 to Face, et al. and U.S. Patent No. 5,850,416 to Myer. Claims 28-30 are rejected under 35 U.S.C. 103(a) as being unpatentable over Crenella in view of Adkins, Mabuchi, Face, Myer and U.S. Patent No. 6,209,480 to Moslehi. Claims 32 and 33 are rejected under 35 U.S.C. 103(a) as being unpatentable over Crenella in view of Adkins, Mabuchi, Face, Myer and U.S. Patent Application No. 2002/0024460 to Ghosh et al.

Claims 13-33 are currently pending and remain for consideration.

### **II. Rejections under 35 U.S.C. 103(a)**

In order to “establish prima facie obviousness of a claimed invention, *all claim limitations must be taught or suggested by the prior art.*” (In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974); emphasis added). Furthermore, “all words in a claim must be considered in judging the patentability of that claim against the prior art.” (In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)). According to the Supreme Court, “a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art,” and it is “important to identify *a reason that would have prompted a person of*

***ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.”*** (KSR Intern. Co. v. Teleflex Inc., 127 S.Ct. 1727, 1741 (2007)).

The present invention relates to a device for remote reading of states comprising a communication network and a plurality of peripherals, each of which adopts an instantaneous state. The device also includes a controller periodically scanning the peripherals to read therefrom the instantaneous state. The present invention is characterized in that the communication network electromagnetically connects the peripherals to the controller, and the peripherals are supplied with electrical energy via the communication network. The invention is useful for managing calls in lifts by means of peripherals not provided with any galvanic connection and with any individual power source, and thereby provides significant advantages by reducing the cost and complexity of providing an elevator, or other lift, installation.

Independent claim 13 is directed to a system for remote status readings that includes a communication network and a central controller linked to the communication network. The system of claim 13 further includes a plurality of peripheral devices linked to the controller through the communication network, ***each peripheral device adopting at each instant an instantaneous status belonging to a plurality of possible statuses, the controller being operative to periodically scan the peripheral devices to read their instantaneous statuses***, the communication network being operatively provided so as to link the peripheral devices to the controller by radio frequency means, the peripheral devices being supplied with electrical energy via radio frequency through the intermediary of the communication network.

Regarding the rejection of independent claim 13, the Examiner relies on Crenella, as disclosing several features of the invention. However, the Examiner acknowledges that Crenella does not disclose or suggest the feature of “each peripheral device adopting at each instant an instantaneous status belonging to a plurality of

possible statuses, the controller being operative to periodically scan the peripheral devices to read their instantaneous statuses” (Office action page 3; middle). The Office action relies on Adkins as alleged disclosure of this feature, citing paragraph [0025]. However, paragraph [0025] of Adkins does not disclose or suggest the feature of ***peripheral devices which adopt their own instantaneous status from a plurality of possible statuses***. This paragraph of Adkins states in its entirety:

The core rule engine that executes permanently as a system service controls multiple threads, including a system monitor thread for monitoring operating system messages, events and interrupts, a device change thread for monitoring device hardware and device media changes, a time monitor thread for ***periodically polling device status***, and a special registered thread for monitoring individual hardware devices or software applications. All rules are registered with one of the threads and prioritized for execution by the system service.

(Adkins; paragraph 0025; emphasis added). Applicants submit that the reference to periodic polling of device status in Adkins does not disclose or suggest ***each peripheral device adopting at each instant an instantaneous status belonging to a plurality of possible statuses***. Adkins apparently relates to a computer software package which provides usage enhancement for a user. There is no indication in Adkins of peripheral devices which are capable of adopting a status, nor more particularly that such a status is ***adopted at each instant at each peripheral device***. Applicants submit that none of the references disclose or suggest the feature of independent claim 13 of each peripheral device adopting at each instant an instantaneous status belonging to a plurality of possible statuses. Therefore, the combination of the references, the propriety of which is respectfully not conceded, does not render claim 13 unpatentable.

Additionally, Applicants respectfully submit that, contrary to the assertion in the Office action, there is no suggestion or motivation to combine Crenella and Adkins. The Office action asserts that the motivation to combine the references is to “improve

efficiency of Crenella's system by provide faster respond time due to the periodic monitoring function" (Office action; page 4, top). Applicants respectfully do not understand how a computer software system that provides an unobtrusive rule-based computer usage enhancement system based on different usage patterns for individual users, as discussed in Adkins, would provide a faster response time for a two-part wireless communication system for elevator hallway fixtures, as described in Crenella. The system in Adkins for improving computer usage does not appear compatible with the wireless communications system in Crenella. In fact, Applicants submit that combining Adkins and Crenella would not provide a faster response time, as suggested, since *Crenella includes peripheral devices having their own power sources which can update the controller at any time, for instance at a change of status*. Therefore, since Crenella does not have a system in which the peripheral devices are powered by the communications network, as claimed, the feature of *periodic monitoring* may not improve the response time in Crenella. Applicants therefore respectfully submit that the rejection of claim 13 should be withdrawn for at least this additional reason.

Additionally, the Office action acknowledges that neither Crenella nor Adkins discloses or suggests the feature of "the peripheral devices being supplied with electrical energy *via a radio frequency* through the intermediary of the communication network" (Office action page 4, middle). The Office action relies on Mabuchi as alleged disclosure of this feature, citing paragraph [0255]. However, paragraph [0255] of Mabuchi only discusses an RFID tag and a power source for such RFID tags. Applicants submit that there is no suggestion to modify, or motivation to combine, the maintenance/inspection support apparatus and entry/exit management apparatus of Mabuchi, which apparently only relates to maintenance, inspection and preparation of inspection information using RFIDs, with the wireless communication system for elevators discussed in Crenella. The Office action asserts on page 4 that the motivation to combine the references is to "eliminate the need to have an actual battery within a device so the status of battery will not need to be considered". However, Applicants

submit that this motivation is based upon hindsight reasoning, and is therefore improper. Applicants submit that the only proper basis for combining these three references is Applicants' own specification, which provides a discussion of the advantages and important features of the present application. Applicants therefore respectfully submit that, based on the foregoing, independent claim 13 is allowable over the cited references.

Each of the dependent claims is allowable at least for the same reasons as claim 13 is allowable.

Additionally, with respect to the other obviousness rejections based on additional references, Applicants respectfully acknowledge that the number of references cited in an obviousness rejection does not *alone* present an argument against the combination. However, Applicants submit that this large number of references, combined with the tenuous relationship between the subject matter of the different references argues against their combination. In particular, Applicants direct the Examiner's attention to claim 27, which is rejected based on Crenella in view of Adkins, Mabuchi, Face and Myers. Claim 27 recites that "each peripheral device includes a local antenna coupled to an induction loop of the communication network to receive the electrical energy transmitted by the induction loop". The Office action acknowledges that Crenella, Adkins and Mabuchi do not disclose this feature (Office action; page 11, middle), and relies on Face for this disclosure. Applicants submit that the use of an induction loop to provide power for a wireless communication system as discussed in Crenella, and as modified by Adkins and Mabuchi, is not obviously modified by the inductance loop in Myers. Applicants submit that the combination of Myers and the other references is improper, and therefore respectfully submit that the claims as presented are not obvious. Applicants therefore respectfully request that claim 27, as well as the other claims dependent therefrom, be allowed.

### **III. Conclusion**

Reconsideration and allowance of the present application are respectfully requested. Any fee due with this paper, not covered by an enclosed check or credit card authorization, may be charged to Deposit Account No. 06-2143.

Respectfully submitted,

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